

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

BIG LOTS, INC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**NOTICE OF RECLAMATION DEMAND OF TOPAZ DISTRIBUTION, LLC**

**PLEASE TAKE NOTICE** that by and through its undersigned counsel at Polsinelli PC and Perkins Coie LLP, Topaz Distribution, LLC (“**Topaz**”) hereby files this notice of the delivery of written demand for reclamation of goods pursuant to 11 U.S.C. § 546(c), upon Big Lots Stores, LLC, as successor in interest to Big Lots Stores, Inc., and its affiliated debtors (collectively, the “**Debtors**”) and Debtors’ counsel, to reclaim certain assets (the “**Goods**”) that are subject to reclamation. The Goods were manufactured and sold to the Big Lots Stores, LLC, as successor in interest to Big Lots Stores, Inc., in the ordinary course of Topaz’s business and delivered to and received by the Debtors during the forty-five (45) day period prior to the filing of the above-captioned chapter 11 cases while the Debtors were insolvent. Topaz attaches as **EXHIBIT A** and incorporates herein by reference a copy of its formal reclamation demand dated September 18, 2024.

**PLEASE TAKE NOTICE** that Topaz reserves all of its rights and remedies under Title 11 of the United States Code (as amended, the “**Bankruptcy Code**”), the Uniform Commercial

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Code, and any other applicable law, including the right to amend and/or supplement this Notice and to maintain that Topaz has title to the Goods. Nothing herein shall be deemed or constitute a waiver of, and Topaz expressly reserves any and all rights, claims, remedies, interest, and defenses, whether at law or in equity, including but not limited to Topaz's right to an allowed administrative expense claim under section 503(b)(9) of the Bankruptcy Code or under any other applicable federal or state law.

Dated: September 24, 2024  
Wilmington, Delaware

**POLSINELLI PC**

/s/ Christopher A. Ward

Christopher A. Ward (Del. Bar No. 3877)

Michael V. DiPietro (Del. Bar No. 6781)

222 Delaware Avenue, Suite 1101

Wilmington, Delaware 19801

Telephone: (302) 252-0920

Facsimile: (302) 252-0921

cward@polsinelli.com

mdipietro@polsinelli.com

-and-

**PERKINS COIE LLP**

Amir Gamliel

1888 Century Park East, Suite 1700

Los Angeles, CA 90067-1721

Telephone: (310) 788-3276

Facsimile: (310) 843-1246

AGamliel@perkinscoie.com

*Counsel for Topaz Distribution, LLC*